

Hal Taylor, Esq.
Of Counsel, Olinsky Law Group
NV Bar No.: 4399
2551 West Lakeridge Shores
Reno, NV 89509
Tel: (775) 825-2223
Fax: (775) 329-1113
Email: HalTaylorLawyer@gbis.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHERYL A. MOORE-HOPKINS,

Plaintiff,

v.

ANDREW SAUL,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO. 2:20-cv-01825-DJA

**CONSENT MOTION
FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S BRIEF**

Plaintiff, Cheryl A. Moore-Hopkins, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a sixty-day extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed April 24, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. This, prevents counsel from preparing a proper and meritorious brief. Plaintiff requests this time to allow for review of the record and proper preparation of Plaintiff's Brief. Wherefore, Plaintiff requests an extension from April 24, 2021 up to and including June 23, 2021 to file her brief.

1 Counsel for the Plaintiff has conferred with defendant's counsel who kindly has no objection to
2 this request.

3 Dated this 22nd day of April, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.
7 Of Counsel, Olinsky Law Group
8 NV Bar No.: 4399
9 223 Marsh Ave.
10 Reno, NV 89509
11 Tel: (775) 825-2223
12 Fax: (775) 329-1113
13 HalTaylorLawyer@GBIS.com

14 **Plaintiff's Certificate of Service:**


15 I certify that I caused the Motion for Extension of Time to be served today, April 22,
16 2021, by CMECF to Marcelo Illarmo, who is a filing user of the CMECF system.

17 /s/Hal Taylor

18 Hal Taylor, Esq.

19
20
21 **IT IS SO ORDERED.**

22 DATED: April 23, 2021

23
24 

25
26 DANIEL J. ALBREGTS
27 UNITED STATES MAGISTRATE JUDGE
28